

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

CIGNA HEALTHCARE OF TENNESSEE, INC., on behalf of itself and its affiliated entities,)	
)	
Applicant/Defendant,)	Case No. 2:23-cv-02550
)	
v.)	Judge John T. Fowlkes, Jr.
)	
BAPTIST MEMORIAL HEALTHCARE CORPORATION,)	
)	
Respondent/Plaintiff.)	
)	

MOTION TO SET AGREED BRIEFING SCHEDULE

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 6.1, Cigna HealthCare of Tennessee, Inc. (“Cigna”) moves this Court to enter an agreed briefing schedule regarding Baptist Memorial HealthCare Corporation’s (“Baptist”) Motion to Remand. (ECF 13 and 14.) In support, Cigna states the following.

1. Baptist filed its Motion to Remand on September 26, 2023. (ECF 13 and 14.)
2. Cigna’s current deadline to file a response in opposition to Baptist’s Motion to Remand is set by rule as October 10, 2023. Baptist’s current deadline to file a reply in support of its Motion to Remand is set by rule as October 17, 2023.
3. Counsel for Cigna is scheduled for a trial starting on October 9, 2023 through October 27, 2023.
4. Counsel for Cigna thus requested that Baptist agree to a briefing schedule related to its Motion to Remand that extends the current filing deadlines.

5. Counsel for Baptist has represented that it agrees to the following briefing schedule related to its Motion to Remand:

- a. Cigna is to file its response in opposition by November 6, 2023.
- b. Baptist is to file its reply in support by November 14, 2023.

6. Cigna has not previously requested any extension regarding Baptist's Motion to Remand, and the agreed briefing schedule will not prejudice either party nor impact the orderly proceedings of this case.

WHEREFORE, Cigna requests that the Court enter the agreed briefing schedule as to Baptist's Motion to Remand, allow Cigna to file its opposition by November 6, 2023, and allow Baptist to file its reply in support by November 14, 2023.

Dated: October 2, 2023

Respectfully submitted,

/s/ Andrew J. Pulliam

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Attorneys for Cigna HealthCare of Tennessee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023 the foregoing was filed on the Court's ECF system, which will serve all parties of record.

/s/ Andrew J. Pulliam
Andrew J. Pulliam (Tenn. Bar No. 16863)